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UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
THEIR MOTION TO COMPEL  
30(B)(6) TOPICS AND EXHIBITS  
THERE TO**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Motion to Compel 30(b)(6) Topics and exhibits thereto. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Motion to Compel 30(b)(6) Topics (“Motion”)	Highlighted Portions	Plaintiff (green)
Declaration of Esther Chang	Highlighted Portions	Plaintiff (green)
Exhibits 1, 6, 7 & 8	Highlighted Portions	Plaintiff (green)
Exhibits 2-5 & 9-12	Entireties	Plaintiff

The green-highlighted portions of the Motion, the Declaration of Esther Chang, and Exhibits 1, 6, 7 & 8, as well as the entireties of Exhibits 2-5 & 9-12 contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal, ¶ 3.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on August 20, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.”

1 Dated: August 20, 2017

MORRISON & FOERSTER LLP

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3 By: /s/Arturo J. González  
ARTURO J. GONZÁLEZ

4 Attorneys for Defendants  
5 UBER TECHNOLOGIES, INC.,  
6 OTTOMOTTO LLC, and OTTO  
7 TRUCKING LLC  
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